

Exhibit 2



Deposition of:
CONF. Daniel J. Slottje , Ph.D.

May 9, 2019

In the Matter of:
**Blue Cross Blue Shield Antitrust
Litigation/in Re**

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1 Q. Okay. Other than those hundred
2 and six healthcare entities, are you providing
3 an opinion in this case for any potential
4 damages for any other healthcare provider in
5 Alabama?

6 A. Not at this time.

7 Q. Okay. And am I correct in
8 understanding that your report, Slottje 1, any
9 damages opinions that are there exclusively
10 relate to the hundred and six hospitals that
11 you just defined?

12 A. Yes.

13 Q. Why did you decide to limit your
14 opinion to the hundred and six hospitals?

15 A. That's what counsel asked me to
16 do.

17 Q. Did you undertake any effort to
18 assess damages for any other healthcare
19 providers as part of your assignment?

20 A. No.

21 Q. And you limited it to the hundred
22 and six because of Plaintiffs' counsel's
23 instructions; correct?

24 A. Correct.

25 Q. The other thing I'm going to try